

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DON LIPPERT, *et al.*, )  
Plaintiffs, )  
v. ) No. 10-cv-4603  
JOHN BALDWIN, *et al.*, ) Honorable Judge Jorge L. Alonso  
Defendants. )

**DEFENDANTS' MEMORANDUM IN SUPPORT OF  
FINAL APPROVAL OF CONSENT DECREE**

Defendants, J.B. Pritzker, John Baldwin and Steve Meeks, by and through their attorney, Kwame Raoul, Illinois Attorney General, in support of the approval of the consent decree in the instant case, state the following:

1. Defendants have reviewed the Plaintiffs' Memorandum in Support of Proposed Settlement. Dkt. No. 1230-1.
2. Defendants take exception to those portions of Plaintiffs' memorandum that state the Defendants and/or the Illinois Department of Corrections have committed or are committing a constitutional violation. Defendants have denied and continue to deny that any constitutional violation was committed by any Defendant or the Illinois Department of Corrections.
3. Defendants do agree that it is in the best interest of the parties and the class members that this matter be resolved by the entry of the consent decree that has been proposed to the Court. Additionally, all of the factors to be considered under Federal Rule of Civil Procedure 23(e) favor settlement in this instance.

WHEREFORE, Defendants respectfully request that the Court grant final approval of the consent decree and issue an order finding that the consent decree is fair, reasonable,

and adequate as required by Rule 23(e) of the Federal Civil Rules of Procedure. Accordingly, Defendants request that the Court enter the proposed consent decree submitted by the parties.

Dated: April 26, 2019

Respectfully Submitted,

KWAME RAOUL  
Attorney General of Illinois

/s/ Nicholas S. Staley  
Nicholas S. Staley  
Michael D. Arnold  
Christopher R. Fletcher  
Assistant Attorneys General  
General Law Bureau  
Office of the Illinois Attorney General  
100 West Randolph Street, 13<sup>th</sup> Floor  
Chicago, Illinois 60601  
(312) 814-3711  
nstaley@atg.state.il.us  
marnold@atg.state.il.us  
cfletcher@atg.state.il.us

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 26, 2019 he electronically filed the foregoing document with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system. All participants in the case are registered CM/ECF users who will be served by the CM/ECF system.

*/s/ Nicholas S. Staley*  
NICHOLAS S. STALEY